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*Attorneys for Plaintiffs and the Proposed Plaintiff Class and Collective*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

COMMUNICATIONS WORKERS OF  
AMERICA, LINDA BRADLEY, MAURICE  
ANSCOMBE, LURA CALLAHAN,  
RICHARD HAYNIE, and others similarly  
situated,

Plaintiffs,

v.

T-MOBILE US, INC., and AMAZON.COM,  
INC.,

Defendants.

Case No. 17-cv-07232-BLF

**DECLARATION OF PETER ROMER-  
FRIEDMAN IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS**

Date: January 16, 2020  
Time: 9:00 a.m.  
Courtroom: San Jose Courthouse, Rm 3  
Judge: Hon. Beth L. Freeman

1 I, Peter Romer-Friedman, declare:

2 1. I am Counsel at the firm of Outten & Golden LLP in Washington, D.C. I am admitted  
3 *pro hac vice* to practice before this Court. I am one of the lawyers primarily responsible for prosecuting  
4 Plaintiffs' claims in this action. I make these statements based on personal knowledge and would so  
5 testify if called as a witness at trial.

6 2. Attached to this Declaration as **Exhibit 1** is a true and correct copy of the Statement of  
7 Interest of the United States in *National Fair Housing Alliance v. Facebook, Inc.*, No. 18 Civ. 2689  
8 (S.D.N.Y. Aug. 17, 2018) (ECF No. 48).

9 3. Attached to this Declaration as **Exhibit 2** is a true and correct copy of the U.S.  
10 Department of Housing and Urban Development's Charge of Discrimination against Facebook, Inc.,  
11 FHEO No. 01-18-0323-8 (Mar. 28, 2019),  
12 [https://www.hud.gov/sites/dfiles/Main/documents/HUD\\_v\\_Facebook.pdf](https://www.hud.gov/sites/dfiles/Main/documents/HUD_v_Facebook.pdf).

13 4. Attached to this Declaration as **Exhibit 3** are true and correct copies of Charges of  
14 Discrimination filed by Linda Bradley with the U.S. Equal Employment Opportunity Commission  
15 ("EEOC") against Capital One Financial Corporation, DriveTime Automotive Group Inc., Edward D.  
16 Jones & Co., L.P., Enterprise Holdings, Inc., Nebraska Furniture Mart, Inc., Renewal by Andersen LLC,  
17 and Sandhills Publishing Company, as well as the corresponding Letters of Determination issued by the  
18 EEOC. The factual and legal allegations in these charges are identical to the allegations made by other  
19 complainants represented by Outten & Golden LLP—including the Communications Workers of  
20 America—in Charges of Discrimination that were concurrently filed with the EEOC against the same  
21 seven respondents identified above. Personal identifying information contained in the Charges and  
22 Letters of Determination has been redacted.

23 I declare, under penalty of perjury, under 28 U.S.C. § 1746 and the laws of the State of  
24 California, that the foregoing is true and correct.

25 Executed on September 24, 2019 at Washington, D.C.

26 /s/ Peter Romer-Friedman  
27 Peter Romer-Friedman  
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